Pennsylvania Department of Environmental Protection Southeast Regional Office Waste Management / Environmental Cleanup Program Lee Park, Suite 6010 555 North Lane Conshohocken, PA 19428



Date: 8-1-00

Time: 3:25 PM

Number of pages including cover sheet: 3

Joseph M.	EDowell	
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Phone:		
Fax phone: 2/5-8/1	K-3002	
CC;	·	

Urgent

REMARKS:

From:	
David	Minskel
	· · · · · · · · · · · · · · · · · · ·
Phone:	610-832-6193
Fax phone:	610 - 832 - 6143

JR-	Res Crater	
T'us ach	ed uit uma arriana	1 accesiated to help
me respond to	ed my more experienced your request for sta	te ARARS.
_	eed any more than the	attached, let me know.
	Dave Monther 610-832-	
	610-832	6193

For your review

Reply ASAP

PLEASE CALL IF YOU ENCOUNTER PROBLEMS WITH THIS FAX

Please comment

Enoma Olevilor Craig

From: Olewiler, Craig

Sent: Monday, July 31, 2000 1:54 PM

To: Minsker, David

Subject: RE: Commonwealth ARARs

Dave:

EPA should have requested ARARs throughout the Remedial Investigation and Feasibility Study so you may want to look and see what ARARs were used for analysis of the remedial alternatives, particularly in the FS. Here is a general list you can go by:

Chemical Specific ARARs for soil and groundwater.

PA Code Title 25, Chapter 250, Administration of Land Recycling Program. The Chapter 250 regulations establish cleanup standards for contaminated media in soil and groundwater.

Action Specific ARARs:

Pa Code Title 25, Chapters 287-299. Residual Waste Management Regulations. These chapters specify general procedures, definitions and rules for the generation, management and handling of residual waste.

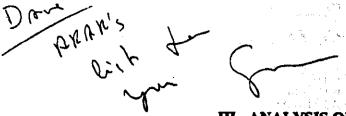
Pa Code Title 25, Chapters 260a-266a, 266b and 268a-270a remain as Pa. ARARs. The remainder of the Pa. Hazardous Waste Regulations are incorporated into the federal regulations by reference in 40 CFR Parts 124, 260-270, 273 and 279. The Hazardous Waste Regulations establish the requirements for the transportation, storage and disposal of Hazardous Waste.

Pa Code Title 25, Chapter 102, Erosion Control. This chapter sets forth provisions that impose requirements on earth moving activities to prevent erosion.

Any questions please call me at 717-783-9654.

Craig

----Original Message----



III. ANALYSIS OF ALTERNATIVES

This proposed response is not a final remedial response pursuant to Section 504 of HSCA and therefore is not required to meet the cleanup standards that apply to final remedial responses. Additional response action may be needed to achieve a complete, permanent and final cleanup for the site.

Applicable, Relevant and Appropriate Requirements (ARARs)

The following standards, requirements, criteria or limitations are legally applicable, or relevant and appropriate under the circumstances presented by the site.

Waste Management -

Act 97 - The Solid Waste Management Act

Pennsylvania Code, Title 25

Chapters 260-270 - Hazardous Waste Chapters 271-285 - Municipal Waste

Chapters 287-299 - Residual Waste

Water Quality -

The Clean Streams Law

Ground Water Protection Strategy

Pennsylvania Code, Title 25

Chapter 105 - Dam Safety and Waterway Mgt.

Air Quality -

Air Pollution Control Act

Pennsylvania Code, Title 25

Chapter 123 - Standards for Contaminants

Chapter 127 - Construction, Modification, Reactivation, and Operation of

Sources

Environmental Cleanup -

Act 108 - The Hazardous Sites Cleanup Act

Act 2 - The Land Recycling and Environmental Remediation Standards Act

Pennsylvania Code, Title 25

Chapter 250 – Administration of the Land Recycling Program

Alternative 1. No Action

A "No Action" alternative provides a baseline against which all other alternatives can be compared and/or judged. Should the Department select the "No Action" alternative, any actual or potential health and environmental risk posed by the site would remain the same. A "No Action" alternative would not comply with the ARARs for the site.

Alternative 2. Waste Removal and Disposal

This alternative consists of safely repackaging, temporarily storing, sampling for disposal purposes, and shipping the wastes offsite to approved disposal facilities.